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The Honorable Marc Barreca
Chapter 13
Location: ZoomGov
Hearing Date: November 9, 2022
Hearing Time: 9:00 a.m.
Response Date: November 2, 2022

6
7 IN THE UNITED STATES BANKRUPTCY COURT
8 FOR THE WESTERN DISTRICT OF WASHINGTON

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11 In re:
12 NANCY GRACE,
13 Debtor(s).
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: Case No.: 21-10964

: MOTION FOR APPROVAL OF
: SALE OF REAL PROPERTY and NOTICE
: OF HEARING ON MOTION

TO: The Clerk of the Above-Entitled Court
AND TO: All creditors and the Chapter 13 Trustee

YOU ARE HEREBY NOTIFIED that a hearing on debtor's Motion for Approval of Sale of Real Property will be heard before The Honorable Marc Barreca via ZoomGov on November 9, 2022 at 9:00 a.m. Instructions for call in are as follows:

Instructions

Join ZoomGov Meeting

<https://www.zoomgov.com/j/1607704823?pwd=TUYxditUQ211OWdNeXVuYIZ5bTdBT09>(link is external)

Meeting ID: 160 770 4823

Passcode: 781136

One tap mobile

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Motion to Approve Sale of Real Property

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Marysville, WA 98270 || **Law**
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If you choose to respond to this motion, you must do so before November 2, 2022 by filing a written objection with the Clerk of the Court and serving a copy of your objection on debtor's counsel. If you fail to do so, the Court may enter an order granting the motion without any hearing and without any further notice to you.

MOTION

COMES NOW the debtor and moves the Court for approval and authorization to sell the property located at 9210 Market Place, Unit G-102, Lake Stevens, WA for \$325,000.00. The debtor bases this on the following:

1. The debtor filed this Chapter 13 case on 5/17/21.
2. The plan was confirmed on 7/29/21.
3. The debtors have entered into a Purchase and Sales Agreement in order to sell the home located at 9210 Market Place, Unit G-102, Lake Stevens, WA for \$325,000.
4. The buyers are not related to the debtor. The purchase price reflects the fair market value of the property.
5. There is a first mortgage on the property which will be paid in full from the sales proceeds.
6. There is a lien from FairWeather Pointe COA which will be paid from the sales proceeds.
7. There are also agents' fees, property taxes, utility, sewer charges, excise taxes, escrow fees and other closing costs associated with the sale, which will also be paid from the sales proceeds.

1 8. From the proceeds, the debtor will also pay \$3,000.00 to pay additional attorney fees
2 as approved with any remaining balance to allowed unsecured claims to the Trustee.

3 The funds shall be sent to the Chapter 13 Trustee at the following address: Jason
4 Wilson-Aguilar, Chapter 13 Trustee, PO BOX 2139, Memphis, TN 38101-2139. The
5 form of payment shall be made payable to Jason Wilson-Aguilar, Chapter 13 Trustee,
6 and shall include the debtors' name and case number (21-10527- MLB).

7 9. Any remaining funds will be paid to the debtor. Any earnest money payments will
8 also be released to the debtor immediately.

10 10. All fees and costs associated with the sale will be paid directly from the closing agent.
11 A settlement statement is attached to this motion and reflects estimated numbers. The
12 settlement statement is subject to change.

13 Debtor represents that the property being sold at its fair market value and that a better
14 price or terms cannot be obtained from other purchasers, and that the sale is an arm's-length
15 transaction.

16 The debtor further moves the Court for an Order waiving the 14-day waiting period for
17 the Order to be effective.

18 A copy of the proposed order is attached as an Exhibit to this motion.

19 Dated this 10th day of October 2022

20 NEELEMAN LAW GROUP
21 /s/ Thomas D. Neeleman
22 Thomas D. Neeleman
23 Attorney for debtor